

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GLOBAL DETECTION AND
REPORTING, INC.,

Civil Action No.: 08-CIV-5441

Plaintiff,

(GEL/FM)

-against-

**NOTICE OF MOTION
TO DISMISS PURSUANT
TO FED.R.CIV.P. 12(b)(6)**

SECURETEC DETEKTIONS-
SYSTEME AG and SECURETEC
CONTRABAND DETECTION AND
IDENTIFICATION, INC.,

Defendants.

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PLEASE TAKE NOTICE that, upon the declaration of William S. Nolan, Esq., executed on July 3, 2008, and the exhibit thereto, as well as the accompanying memorandum of law, and all prior pleadings in this action, Defendants Securetec Detektions-Systeme AG and Securetec Contraband Detection and Identification, Inc. ("Defendants"), hereby move pursuant to Fed.R.Civ.P. 12 (b)(6), before the Honorable Gerard E. Lynch, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order dismissing with prejudice the second, third, and fourth causes of action included in Plaintiff's complaint, and granting Defendants such other and further relief as the Court shall deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 6.1, Defendants hereby request that any opposing affidavits and/or memoranda of law be served upon the undersigned within ten (10) business days.

Dated: Albany, New York
July 3, 2008

WHITEMAN OSTERMAN & HANNA LLP

BY: /s/ William S. Nolan

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